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Attorneys for Defendant DOCTORS MANAGEMENT
COMPANY LONG TERM DISABILITY PLAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

LOVEY MARTIN,

Plaintiff,

v.

DOCTORS MANAGEMENT
COMPANY LONG TERM
DISABILITY PLAN,

Defendant.

CASE NO. CV 07-5952 CW

[Assigned for all purposes to the
Honorable Claudia Wilken; Ctrm 2]

**STIPULATION TO CONTINUE
INITIAL CASE MANAGEMENT
CONFERENCE; [PROPOSED]
ORDER**

ACTION FILED: 11/26/07

Plaintiff Lovey Martin and defendant Doctors Management Company Long
Term Disability Plan (collectively, the "parties") through their respective attorneys of
record hereby stipulate and agree to the following:

1. Plaintiff served Defendant with notice of the lawsuit, complaint and
request for waiver of service of the summons on December 13, 2007. Defendant
acknowledged receipt of the complaint and waiver of service on January 14, 2008.
Defendant's response to the complaint is due on or before February 11, 2008.

2. The Court has set the Initial Case Management Conference pursuant to Rule 26(f) on February 26, 2008. The last day for the parties to meet and confer regarding early disclosures, early settlement, ADR process selection and discovery plan pursuant to Rule 26(f) is February 5, 2008. As the dates are currently set, the parties will have to meet and confer and exchange documents before Defendant has even responded to the complaint. The parties believe that it would be more productive for the parties if the early meeting of counsel were to take place after Defendant has filed its responsive pleading.

3. Accordingly, the parties jointly stipulate and request that the Initial Case Management Conference currently set for Tuesday, February 26, 2008, be continued approximately five weeks to Tuesday April 8, 2008, at 2:00 p.m., to permit Defendant to file a pleading responsive to the complaint prior to conducting the Rule 26(f) early meeting of counsel and exchanging documents.

DATED: ^{Feb.} January 5, 2008

LAW OFFICE OF RICHARD JOHNSTON

By Richard Johnston
Richard Johnston
Attorney for Plaintiff LOVEY MARTIN

DATED: ^{Feb.} January 6, 2008

LEWIS BRISBOIS BISGAARD & SMITH LLP

By Ralph A. Lappala
Ralph A. Lappala
Elise D. Klein
Kristin P. Kyle de Bautista
Attorneys for Defendant DOCTORS
MANAGEMENT COMPANY LONG TERM
DISABILITY PLAN

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

The hearing on the Status Conference is continued to April 8, 2008 at 2:00 p.m. in Courtroom 2 of the above-entitled Court.

Dated: January __, 2008

Honorable Claudia Wilken
Magistrate Judge, United States District Court

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